

EXHIBIT 7

Chaelle O'Quin

February 14, 2023

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

JOSEPH MICHAEL PHILLIPS,)
)
Plaintiff,)
)
VS.) Civil Action
) No. 4:22-cv-184-ALM
COLLIN COUNTY COMMUNITY)
COLLEGE DISTRICT, et al.,)
)
Defendants.)

ORAL AND VIDEOTAPED DEPOSITION OF
CHAELE O'QUIN
FEBRUARY 14, 2023

ORAL AND VIDEOTAPED DEPOSITION OF CHAELE O'QUIN,
produced as a witness at the instance of the Plaintiff,
and duly sworn, was taken in the above-styled and
numbered cause on February 14, 2023, from 1:54 p.m. to
5:47 p.m., before Christy Cortopassi, CSR in and for the
State of Texas, reported by machine shorthand, at the
law offices of Abernathy Roeder Boyd Hullett, 1700 N.
Redbud Boulevard, Suite 300, McKinney, Texas 75069,
pursuant to the Federal Rules of Civil Procedure and the
provisions stated on the record or attached hereto.

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1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: Good afternoon.

3 We are now on record. This begins videotape Number 1 in
4 the deposition of Chaelle O'Quin in the matter of Joseph
5 Michael Phillips versus Collin County Community College
6 District, et al.

7 Today's date is February 14th, 2023, and
8 the time is 1:54 p.m.

9 Would the reporter please swear in the
10 witness.

11 CHAELLE O'QUIN,
12 having been first duly sworn, testified as follows:

13 EXAMINATION

14 BY MR. BLEISCH:

15 Q. Good afternoon. My name is Josh Bleisch and
16 I'll be taking your deposition today. Before we get
17 started in the questions about the case, I have got a
18 few introductory questions for you.

19 So first, will you please state your name
20 and address for the record?

21 A. Chaelle O'Quin, 4008 Moorcroft Road, Frisco,
22 Texas 75036.

23 Q. Thank you.

24 A. Uh-huh.

25 Q. Have you ever been deposed before?

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1 marked as Exhibit 5.

2 A. Okay.

3 Q. So take your time reading it but I will let you
4 know that I'm only going to ask you about page -- the
5 last page of the full exhibit. I have given you two
6 policies. I may -- but I'm only going to ask you about
7 the very last page there.

8 A. Okay.

9 Q. So what is this document?

10 A. The entire document or just this page?

11 Q. The entire document.

12 A. I think it spells out the mission and the
13 purpose of the college.

14 Q. Okay. And that contains the college's core
15 values?

16 A. Yes, sir.

17 Q. And --

18 MR. McSHANE: Well, just one second. I
19 think we may have a different document. Never mind.

20 MR. BLEISCH: It might have slid into --

21 MR. McSHANE: Yeah. Okay. Sorry.

22 MR. BLEISCH: No problem.

23 Q. (BY MR. BLEISCH) So Number 5, under the
24 college's core values, mentions dignity and respect. Is
25 there any definition for these terms, dignity and

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1 respect?

2 A. Again, as we said earlier, when you say
3 definitions, are you saying are they posted somewhere or
4 are you saying that these have a -- what is your
5 question related?

6 Q. Are the definitions posted somewhere?

7 A. Not that I'm aware of.

8 Q. Are these -- are dignity and respect here the
9 same dignity and respect as you understand it in the
10 code of ethics?

11 A. Yes, sir. I think the Collin -- the core
12 values use common colloquial terms that -- even with
13 learning, dignity and respect are words that most
14 professionals know the definitions on. So I wouldn't
15 expect that it would be outlined in a very rudimentary
16 way, but yes.

17 Q. Most people would have some general
18 understanding of them?

19 A. I would think so.

20 Q. Do you think people's understandings differ in
21 some ways?

22 A. I think if they had to write a definition it
23 would differ but I think in all, globally, dignity and
24 respect mean the same to most people.

25 Q. And remind me, what does dignity mean to you?

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1 A. It means having some consideration for other
2 people and for their value and their thoughts, their
3 choices in their decision making.

4 Q. And what does respect mean to you?

5 A. Having consideration and showing compassion and
6 care.

7 (Exhibit 6 marked.)

8 Q. (BY MR. BLEISCH) I'm now showing you what I
9 have marked as Exhibit 6. It's pretty long but take
10 your time to look through it. I'm mostly going to be
11 asking you about the first two pages.

12 A. Okay.

13 Q. Did you know about an issue from 2017 regarding
14 calls for the removal of confederate monuments in
15 Dallas?

16 A. No, sir.

17 Q. Have you seen this document before?

18 A. No, sir.

19 Q. Is racism in the Dallas/Fort Worth area a
20 matter of public concern?

21 A. Yes, sir.

22 Q. Is the removal of confederate monuments in
23 Dallas a matter of public concern?

24 A. Yes.

25 Q. And you have not seen those before?

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REPORTER'S CERTIFICATION
DEPOSITION OF CHAELLE O'QUIN
FEBRUARY 14, 2023

I, Christy Cortopassi, Certified Shorthand Reporter
in and for the State of Texas, hereby certify to the
following:

That the witness, CHAELLE O'QUIN, was duly sworn by
the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

That the deposition transcript was submitted on
_____ to the witness or to the attorney
for the witness for examination, signature and return to
me by _____;

That the amount of time used by each party at the
deposition is as follows:

Mr. Joshua T. Bleisch.....03:27
Mr. Charles Joseph Crawford.....00:00
Mr. Joseph Bailey McShane.....00:00

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1 I further certify that pursuant to FRCP No.
2 30(f)(i) that the signature of the deponent:

3 X was requested by the deponent or a party
4 before the completion of the deposition and that the
5 signature is to be returned within 30 days from date of
6 receipt of the transcript. If returned, the attached
7 Changes and Signature Page contains any changes and the
8 reasons therefor;

9 _____ was not requested by the deponent or a party
10 before the completion of the deposition.

11 I further certify that I am neither counsel for,
12 related to, nor employed by any of the parties or
13 attorneys in the action in which this proceeding was
14 taken, and further that I am not financially or
15 otherwise interested in the outcome of the action.

16 Certified to by me this _____ of _____,
17 2023.

18
19 

20 Christy Cortopassi, Texas CSR 6222
21 Expiration Date: 10/31/2024

22 Firm Registration No. 633
23 Magna Legal Services
24 866.624.6221
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